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February 18, 2010

Ms. Marlene H. Dortch, Commission Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554

Filed Electronically Via ECFS

RE: Telehouse International Corporation of America
Customer Proprietary Network Information Certification
EB Docket No. 06-36

Dear Ms. Dortch:

Telehouse International Corporation of America, by its undersigned attorneys, hereby submits its 2009 CPNI Compliance Certificate and Accompanying Statement certifying compliance with Section 64.2001 *et seq.* of the Commission's rules.

Please contact the undersigned should you have any questions or concerns at (269) 381-8893 extension 226 or patrick@crockerlawfirm.com.

Very truly yours,

CROCKER & CROCKER, P.C.


Patrick D. Crocker

PDC/tld

Enclosures

cc: Best Copy and Print, Inc. (via e-mail FCC@BCPIWEB.COM)

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2009

Date filed: February 18, 2010

Name of company covered by this certification: Telchouse International Corporation
of America

Form 499 Filer ID: 828094

Name of signatory: Kojo Shikano

Title of signatory: Executive Vice President

I, Kojo Shikano, certify that I am Executive Vice President of Telehouse International Corporation of America, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is currently in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

This certification is dated this 18th day of February, 2010



Kojo Shikano
Executive Vice President
Telehouse International Corporation of America

Customer Proprietary Network Information Certification Accompanying Statement

Telehouse International Corporation of America has established practices and procedures adequate to ensure compliance with Section 222 of the Communications Act of 1934, as amended, ("section 222") and the Federal Communications Commission's ("FCC") rules pertaining to customer proprietary network information ("CPNI") set forth in sections 64.2001 – 64.2011 of the Commission's rules. This attachment summarizes those practices and procedures, which have been updated so that they are adequate to ensure compliance with the Commission's CPNI rules.

Telehouse International Corporation of America provides private telecommunications services over dedicated lines to large enterprise and carrier customers pursuant to ICB contracts. Telehouse International Corporation of America's customer contracts uniformly contain confidentiality agreements that address customers' private information. It is Telehouse International Corporation of America's policy not to disclose CPNI except as specifically set out in its contracts with its customers and where required by law.

Safeguarding against pretexting

- Telehouse International Corporation of America takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI, including the authentication of customers prior to disclosing CPNI based on customer-initiated contacts. Telehouse International Corporation of America is committed to notify the FCC of any novel or new methods of pretexting it discovers and of any actions it takes against pretexters and data brokers.

Training and discipline

- Telehouse International Corporation of America has an express disciplinary process in place for violation of the Telehouse International Corporation of America's CPNI practices and procedures. Telehouse International Corporation of America employees are required to review and abide by Telehouse International Corporation of America's Staff Handbook, which, prohibits all employees from using customer information other than for providing service to the customer or as required to be disclosed by law.

Telehouse International Corporation of America's use of CPNI

- Telehouse International Corporation of America uses CPNI for the following purposes:
 - (1) To initiate, render, maintain, repair, bill and collect for services
 - (2) To protect its property rights; or to protect its subscribers or other carriers from fraudulent, abusive, or the unlawful use of, or subscription to, such services;
 - (3) For network maintenance; and
 - (4) As required by law.

- Telehouse International Corporation of America does not distribute CPNI to third parties for their sales or marketing purposes. Nor does Telehouse International Corporation of America share, sell, lease or otherwise provide CPNI to any of its affiliates, suppliers, vendors, or any other third party for the purpose of marketing any service.
- Telehouse International Corporation of America does not share, sell, lease or otherwise provide CPNI to any third party except pursuant to appropriate non-disclosure agreements. Telehouse International Corporation of America will not otherwise disclose CPNI to a third party except when required by a lawfully issued government subpoena.

Additional safeguards

- Telehouse International Corporation of America does not use CPNI for marketing purposes and therefore does not have records to maintain regarding marketing campaigns that use its customers' CPNI.
- Telehouse International Corporation of America has established a supervisory review process designed to ensure compliance with the FCC's CPNI rules.
- Telehouse International Corporation of America designates one or more officers, as an agent or agents of the Telehouse International Corporation of America, to sign and file a CPNI compliance certificate on an annual basis. The certificate conforms to the requirements set forth in FCC rule 64.2009(e).
- Telehouse International Corporation of America does not disclose CPNI over the phone and does not allow for online access to CPNI.
- In the event of a breach of CPNI, Telehouse International Corporation of America will comply with all applicable breach notification laws.

STATEMENT OF ACTIONS TAKEN AGAINST DATA BROKERS

- A. During Calendar Year 2009, the Company has instituted the following proceeding, or filed the following petitions, against data brokers before the Federal Communications Commission:

NONE

- B. During Calendar Year 2009, the Company has instituted the following proceeding, or filed the following petitions, against data brokers before the various Public Utilities Commissions:

NONE

- C. During Calendar Year 2009, the Company has instituted the following proceeding, or filed the following petitions, against data brokers before the following federal or state courts:

NONE

**SUMMARY OF CUSTOMER COMPLAINTS
REGARDING UNAUTHORIZED RELEASE OF CPNI**

- A. During Calendar Year 2009, the Company has received the following number of customer complaints related to unauthorized access to, or disclosure of, CPNI due to improper access by Company employees:

NONE

- B. During Calendar Year 2009, the Company has received the following number of customer complaints related to unauthorized access to, or disclosure of, CPNI due to improper disclosure to individuals not authorized to receive the information:

NONE

- C. During Calendar Year 2009, the Company has received the following number of customer complaints related to unauthorized access to, or disclosure of, CPNI due to improper access to online information by individuals not authorized to view the information:

NONE

- D. During Calendar Year 2009, the Company has become aware of the following processes that pretexters are using to attempt to access its CPNI:

NONE